

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE STAND 'N SEAL)	MDL DOCKET NO. 1804
PRODUCTS LIABILITY)	
LITIGATION)	1:07 MD 1804-TWT

DEFENDANT BRTT, INC. F/K/A ROANOKE COMPANIES GROUP, INC.
("BRTT")'S RULE 26(a) INITIAL DISCLOSURES

COMES NOW the Defendant, BRTT, Inc. f/k/a/ Roanoke Companies Group, Inc. d/b/a Tile Perfect, Inc. and f/k/a Color Caulk, Inc. (hereinafter referred to as ("BRTT")), and hereby makes the following initial disclosures pursuant to the Local Rules and F.R.C.P. 26(a):

(1) If the defendant is improperly identified, state defendant's correct identification and state whether defendant will accept service of an amended summons and complaint reflecting the information furnished in this disclosure.

RESPONSE:

BRTT, Inc. ("BRTT") contends that it has been improperly identified as Roanoke Companies Group, Inc. BRTT was formerly known as Roanoke Companies Group, Inc., but is no longer affiliated with the company currently known as Roanoke Companies Group, Inc.

(2) Provide the names of any parties whom defendant contends are necessary parties to this action, but who have not been named by plaintiff. If defendant contends that there is a question of misjoinder of parties, provide the reasons for defendant's contention.

RESPONSE:

BRTT does not contend that any additional parties are necessary parties to this action.

(3) Provide a detailed factual basis for the defense or defenses and any counterclaims or crossclaims asserted by defendant in the responsive pleading.

RESPONSE:

BRTT avers that it complied with all applicable guidelines, regulations, statutes, acts or codes it was subject to. Further, BRTT complied with any and all of its obligations under the Supply and Distribution Agreement with SLR, Inc, and the Supplier / Buyer agreement with Home Depot. BRTT had no prior knowledge of, and had no involvement in any change in formulation of the product at issue. BRTT reserves the right to amend this disclosure as the case progresses, at a later date

(4) Describe in detail all statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law which defendant contends are applicable to this action.

RESPONSE:

BRTT will rely on all applicable statutes, codes, regulations, legal principles, standards and customs or usages, and relevant case law related to Strict Product Liability, Negligence, Breach of Warranty and Punitive Damages for all the applicable jurisdictions. BRTT reserves the right to amend this disclosure as the case progresses, at a later date.

(5) Provide the name and, if know, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A).

RESPONSE:

See Attachment A.

(6) Provide the name of any person who may be used at trial to present

evidence under Rules 702, 703, or 705 of the Federal Rule of Evidence. For all experts described in Fed.R.Civ. P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Initial Disclosure as Attachment B).

RESPONSE:

BRTT has not yet retained any experts it will use at trial in this matter, but reserves the right to amend this disclosure at a later date to identify experts and their written reports in accordance with the Local Rules and the Federal Rules of Civil Procedure.

(7) Provide a copy of, or description by category and location of, all documents, data compilations, and tangible things in your possession, custody, or control that you may use to support your claims or defenses unless solely for impeachment, identifying the subjects of the information. (Attach document list and descriptions to Initial Disclosures as Attachment C).

RESPONSE:

See Attachment C.

(8) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying under Fed.R.Civ.P. 34. (Attach document list and descriptions to Initial Disclosures as Attachment D).

RESPONSE:

Unknown at this time.

(9) If defendant contends that some other person or legal entity is, in whole or in part, liable to the plaintiff or defendant in this matter, state the full name, address and telephone number of such person or entity and describe in detail that basis of such liability.

RESPONSE:

BRTT does not have sufficient knowledge and information at this time to determine whether some other person or legal entity is, in whole or in part, liable to the plaintiff or defendant in this matter. Defendant reserves the right to amend and supplement this disclosure at a later date.

(10) Attach for inspection and copying as under Fed.R.Civ.P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments to satisfy the judgment. (Attach copy insurance agreement to Initial Disclosures as Attachment E).

RESPONSE:

See Attachment E. Chubb Insurance Policy No. 3581-66-75LL referenced as Bates Nos. RCG0000751-RCG0001002; Commercial Excess & Umbrella Insurance Policy No. 7981-94-ILL referenced as Bates Nos. RCG0001003-RCG0001064. Copies of the policies will be available for inspection and copying at the undersigned counsel's office.

Respectfully submitted this 29th day of June, 2007.

PRETZEL & STOUFFER, CHARTERED

By: /s/ Edward B. Ruff, III

Edward B. Ruff, III (IL Bar No. 6181322)

Attorneys for ROANOKE COMPANIES
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INC.

Edward B. Ruff, III, Esq.

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PRETZEL & STOUFFER, CHARTERED

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312-346-1973

312/346-8242

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D

I hereby certify that the attached **DEFENDANT ROANOKE COMPANIES GROUP INC. (“Old Roanoke”) now BRTT INC.’S RULE 26(a) INITIAL DISCLOSURES** is in compliance with paper filing requirement of Local Rule 5.1B, uses Times New Roman 14 point font, as approved by the Northern District of Georgia in Local Rule 5.1C.

By: /s/ Edward B. Ruff, III
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE: STAND 'N SEAL PRODUCTS LIABILITY LITIGATION))))	MDL CASE NO: 1:07-md-1804-TWT ALL CASES
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 29th day of June, 2007, filed electronically via CM/ECF a true copy of the within and foregoing in the United States District Court of appropriate jurisdiction, with notice of same being electronically served by the Court, addressed to the following:

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This 29th day of June, 2007.

PRETZEL & STOUFFER, CHARTERED

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ATTACHMENT A

1. BRTT, Inc. f/k/a Roanoke Companies Group, Inc., its employees, agents and representatives including:

Richard Tripodi, President and Chief Executive Officer
Tom Montalbano, Vice President/Chief Financial Officer
Douglas Vandenburg, Executive Vice President Sales
Michael Lechtenberg, Regional Vice President Sales

Michelle Kascak, Vice President/Research and Development
1702 Kimberly Park Drive
Dalton, GA 30720
800-207-0208

William Kyte, Chairman
Michael Finley, Director of Merchandising
3148 Roanoke Road
Kansas City, MO 64111
800-875-8453
Defendant

Regional Sales Managers:

Todd Young
Doug Ryan
Ed Ramirez
Mike Bobak
Jim Goodrich
Floyd Burt
Frank Lamia
John Thomas
Bob Fisher
Ricardo Gil
Ron Shelton
Ken Hunter
Craig Wendschlag
Chris Boyer

Donald Messier
David Hopkins
Terry Doman
Colin Williams
Brett Tarbox
Levi McKinnis
Keith Pelton
Brett Hughes
Russel Robbennolt
William LaWall
More Duran
Mike Jacobs
Wilfredo Gonzales

2. Chemtrec/Medtrec, its employees, agents and representatives
1300 Wilson Boulevard
Arlington, VA 22209
800-424-9300
Knowledge of personal injury claims
3. Stanton Crenshaw
250 Park Avenue
New York, NY 10003
212-780-1900
Public Relations Agency for BRTT, INC. f/k/a Roanoke Companies Group, Inc.
4. Home Depot USA, Inc., its employees, agents and representatives including:

Jim Robinson, Global Buyer
1400 W. Dundee Road
Buffalo Grove, IL 60089
847-577-3969
Defendant
5. Innovative Chemical Technologies, Inc.
1834 Mallard Lake Drive

Marietta, GA 30068
Telephone unknown
Defendant

6. Aerofil Technology, Inc., its employees, agents and representatives including:

Donna Enloe
Gene Ivnik, President
Kellie Pounds
225 Industrial Park Drive
Sullivan, MO 63080
573-468-5551
Defendant

7. Rocky Mountain Poison and Drug Center, its employees, agents and representatives including:

Dr. Al Bronstein
777 Bannock Street, Mail Code 0180
Denver, CO 80204-4507
800-222-1222
Knowledge of reports of personal injury from product

8. SLR, Inc. d/b/a Easy Care Products, its employees, agents and representatives including:

Mike Jacobson, President
John Spencer, Former President
Lee Starcevich, Former Vice President of Operations
Sandy Swett, Shareholder
20701 N. Scottsdale Road, Suite 107
Scottsdale, AZ 85255
888-745-7325
Defendant

9. U.S. Can Company, its employees, agents and representatives including:

Rick Kieras
1717 Gifford Road
Elgin, IL 60120
847-888-5527
Designed the can artwork for product in question

10. U.S. Consumer Product Safety Commission
Office of Compliance

Its employees, agents and representatives including:

Pamela C. Major, Senior Compliance Officer
Room 613
4330 East West Highway
Bethesda, MD 20814-4408
800-555-1212
Investigating agency

11. Ortec, Inc., its employees, agents and representatives including:

Dr. Larry Brotherton
Christopher Brotherton
P.O. Box 1469
Easley, South Carolina 29641

11. All Plaintiffs have knowledge regarding their use of the product and their alleged injuries and damages.
12. All Plaintiffs' medical providers have knowledge of the injuries allegedly sustained by the Plaintiffs they examined and / or treated.
13. Any persons listed in the Rule 26(a)(1)(A) Disclosures served by any other party in this case.
14. Any persons identified in the course of discovery in this case. BRTT, Inc. does not know at this time all persons it may rely on to support its defenses. As additional persons are identified, BRTT, Inc. will supplement this

disclosure accordingly.

ATTACHMENT C

1. Medical records of all Plaintiffs pre-incident (up to 10 years prior) and post-incident.
2. Employment personnel file of all Plaintiffs and wage and payroll information from any employer Plaintiffs have worked for in 2005, 2006 and present.
3. The retail supply and distribution agreement between SLR, Inc. ("SLR") and Roanoke Companies Group, Inc.'s ("RCG") predecessor in interest, Color Caulk, Inc., dated July 31, 2003.
4. The MSDS for SLR, Inc.'s product SM05 dated March 20, 2003.
5. Original Stand N Seal label.
6. MSDS for Stand N Seal dated May 31, 2005.
7. Cap sticker for Stand N Seal used in the summer/fall 2005.
8. Correspondence with and information received from Consumer Product Safety Commission.
9. MSDS for Stand N Seal dated July 20, 2005.
10. Current Stand N Seal label.
11. Supplier/Buyer Agreement between Roanoke and Home Depot.
12. Chemtrec Incident Reports
13. SLR e-mail to Aerofil Technology, Inc., regarding change in Stand N Seal active ingredient dated 2/24/05.
14. Correspondence between RCG, and Aerofil Technology, Inc.,

regarding Stand N Seal consumer complaints and formula changes.

15. Correspondence between RCG, SLR, and Aerofil Technology, Inc., regarding Stand N Seal distribution.
16. Correspondence between RCG, SLR, and Aerofil Technology, Inc., regarding Stand N Seal distribution.
17. Invoices reflecting manufacturing and distribution costs of Stand N Seal.
18. Invoices and other correspondence reflecting sales of Stand N Seal.
19. Correspondence between RCG and SLR regarding the development of other products.
20. Correspondence between SLR, Aerofil Technology, Inc., and Innovative Chemical Technologies, Inc., regarding change in Stand N Seal raw material.
21. Documents and /or files maintained in the ordinary course of business by BRTT, Inc.
22. Psychological and /or psychiatric records of all the Plaintiffs.
23. Tax returns of all the Plaintiffs for 2005, 2006 and five years prior.
24. All documents produced by any party or non-party in response to BRTT, Inc.'s discovery requests.
25. All documents listed by any other party in its Rule 26(a)(1)(B) designations.

BRTT, Inc. does not know at this time all of the documents it may rely on to

support its defenses. As additional documents are identified, BRTT, Inc. Will supplement this disclosure accordingly.

ATTACHMENT E

1.	Chubb	3581-66-75	6/1/03 to 6/1/04	Occurrence: \$1,000,000 Aggregate: \$2,000,000 (products)
2.	Chubb	7981-94-11	6/1/03 to 4/20/04	Occurrence & Aggregate: \$4,000,000
3.	Chubb	7981-94-11	4/20/04 to 6/1/04	Occurrence & Aggregate: \$7,000,000
4.	Chubb	3581-66-75	6/1/04 to 6/1/05	Occurrence: 1,000,000 Aggregate: 2,000,000 (products)
5.	Chubb	7981-94-11	6/1/04 to 8/10/04	Occurrence & Aggregate: \$7,000,000
6.	Chubb	7981-94-11	8/10/04 to 6/1/05	Occurrence & Aggregate: \$9,000,000
7.	Chubb	3581-66-75	6/1/05 to 6/1/06	Occurrence: \$1,000,000 Aggregate: \$2,000,000 (products)
8.	Chubb	7981-94-11	6/1/05 to 6/1/06	Occurrence & Aggregate: \$9,000,000